

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; SALIX
PHARMACEUTICALS, INC.; PROGENICS
PHARMACEUTICALS, INC.; and WYETH LLC,
formerly known as WYETH,

Plaintiffs,

vs.

MYLAN PHARMACEUTICALS, INC.;
MYLAN LABORATORIES LTD.; and
MYLAN INC.,

Defendants.

Civil Action No. 15-8180 (SRC)(CLW)
(consolidated)

Motion Date: July 2, 2018

**STATEMENT OF NON-OPPOSITION TO DEFENDANTS' MOTION FOR
WITHDRAWAL OF COUNSEL ADMITTED *PRO HAC VICE***

Defendants Mylan Pharmaceuticals, Inc., Mylan Laboratories Ltd. and Mylan Inc. (collectively “Mylan”) respectfully make this submission to notify the Court that no opposition to Mylan’s Motion for Withdrawal of Counsel Admitted *Pro Hac Vice*, filed on behalf of Hidetada James Abe and Andrew Ligotti of the law firm Alston & Bird LLP (the “Motion”), has been filed and, as such, the Motion should be granted.

Mylan filed the Motion on June 4, 2018, setting the motion date for July 2, 2018. Docket No. 331. On June 6, 2018, the Court entered an order granting the Motion (the “Order”). Docket No. 338. Later that day, William P. Deni, Jr. of Gibbons P.C., co-counsel for Plaintiffs Valeant Pharmaceuticals International, Inc. (“VPI”) and Salix Pharmaceuticals, Inc. (with VPI, “Plaintiffs”), submitted a letter claiming that the Order was premature because “Plaintiffs were in the process of drafting opposition to [the Motion].” Docket No. 339 at 1. The Court then issued a text order stating that the Order was issued in error and that it should be disregarded, thereby giving Plaintiffs their requested opportunity to oppose the Motion. Docket No. 340.

The deadline for Plaintiffs to oppose the Motion was June 18, 2018, fourteen days before the motion date of July 2, 2018. *See* Local Civ. R. 7.1(d)(2). Despite objecting to the Order on the grounds that they were preparing opposition papers, Plaintiffs have not filed any opposition to the Motion. It appears that Plaintiffs’ letter was simply a tactical maneuver similar to Plaintiffs’ meritless motion to disqualify Katten Muchin Rosenman LLP pending before the Court. Plaintiffs’ sharp tactics do not compensate for their weak and unsupported positions.

The Motion is unopposed and should be granted.

Dated: New York, New York
June 25, 2018

By: /s/ Jonathan A. Rotenberg
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